

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA**

**JASON HALASA,**

**Plaintiff,**

**v.**

**ITT EDUCATIONAL SERVICES, INC.,**

**Defendant.**

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**Case No. 1:10-cv-0437-WTL-MJD**

**APPENDIX OF DESIGNATED EVIDENCE IN SUPPORT OF  
PLAINTIFF JASON HALASA'S BRIEF IN OPPOSITION TO  
ITT'S MOTION FOR SUMMARY JUDGMENT**

SEALED – SUBJECT TO AGREED PROTECTIVE ORDER DATED OCTOBER 26, 2010

\* \* \*

THIS DOCUMENT CONTAINS CONFIDENTIAL INFORMATION AND IS NOT TO BE  
OPENED, NOR ITS CONTENTS TO BE REVEALED, TO ANYONE OTHER THAN  
AUTHORIZED COURT PERSONNEL OR COUNSEL OF RECORD, EXCEPT BY ORDER  
OF THIS COURT

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA**

<b>JASON HALASA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vi.</b>	)	<b>Case No. 1:10-cv-0437-WTL-MJD</b>
	)	
<b>ITT EDUCATIONAL SERVICES, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**APPENDIX OF DESIGNATED EVIDENCE IN SUPPORT OF PLAINTIFF JASON  
HALASA'S BRIEF IN OPPOSITION TO  
ITT'S MOTION FOR SUMMARY JUDGMENT**

- A.** Cited excerpts from Dr. Jason Halasa Deposition
- B.** Cited excerpts from Gilbert Dean Harris Deposition
- C.** Cited excerpts from Melanie Papke Deposition
- D.** Cited excerpts from Barry Simich Deposition
- E.** Cited excerpts from John Thompson Deposition
- F.** Cited excerpts from Robert Roberts Deposition
- G.** Cited excerpts from Janice Heredia Deposition
- H.** Cited excerpts from Mark Urschel, as ITT's 30(b)(6) Designee, Volume II
- I.** Cited excerpts from William Robinson Deposition
- J.** Cited excerpts from Angelo Ponce Deposition
- K.** Cited excerpts from John Bell Deposition
- L.** Deposition Exhibit No. 155
- M.** Deposition Exhibit No. 61
- N.** Cited excerpts from Valory Hemphill Deposition
- O.** Deposition Exhibit No. 79

- P.** Deposition Exhibit No. 80
- Q.** Deposition Exhibit No. 83
- R.** Deposition Exhibit No. 226
- S.** Deposition Exhibit No. 227
- T.** Deposition Exhibit No. 215
- U.** Deposition Exhibit No. 218
- V.** Deposition Exhibit No. 219
- W.** Deposition Exhibit No. 220
- X.** Deposition Exhibit No. 221
- Y.** Deposition Exhibit No. 222
- Z.** Deposition Exhibit No. 223
- AA.** Deposition Exhibit No. 228
- BB.** Deposition Exhibit No. 213
- CC.** Deposition Exhibit No. 212
- DD.** Deposition Exhibit No. 202
- EE.** Deposition Exhibit No. 204
- FF.** Deposition Exhibit No. 201
- GG.** Deposition Exhibit No. 206
- HH.** Deposition Exhibit No. 203
- II.** Deposition Exhibit No. 186
- JJ.** Deposition Exhibit No. 230
- KK.** ITT Employee Handbook
- LL.** Statement of Rep. Berman

**MM.** Cited excerpts from Mark Urschel, as ITT's 30(b)(6) Designee, Volume I

**NN.** Deposition Exhibit No. 187

**OO.** Deposition Exhibit No. 188

**PP.** Deposition Exhibit No. 196

**QQ.** Deposition Exhibit No. 197

**RR.** Deposition Exhibit No. 198

**SS.** Deposition Exhibit No. 199

**TT.** Deposition Exhibit No. 200

**UU.** Deposition Exhibit No. 209

**VV.** Deposition Exhibit No. 211

**WW.** Deposition Exhibit No. 229

**XX.** ITT Educational Services, Inc. 10-K Annual Filing dated 2-18-2011

**YY.** Erickson email dated 6-24-2009 (ITT020134)

**ZZ.** Bell email dated 6-24-2009 (ITT020135)

**AAA.** Rocha email dated 6-24-2009 (ITT020136)

**BBB.** Solari email dated 6-24-2009 (ITT020132)

**CCC.** Affidavit of Jason Halasa dated May 11, 2011

Respectfully submitted,

PLEWS SHADLEY RACHER & BRAUN LLP

By: s/Katherine E. Taylor  
One of the Attorneys for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of May, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

PLEWS SHADLEY RACHER & BRAUN LLP

By: s/Katherine E. Taylor  
One of the Attorneys for Plaintiff

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